

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY’S HOUSE
RECORDINGS INC., CE OPCO, LLC d/b/a
COMBS GLOBAL f/k/a COMBS
ENTERPRISES, LLC, BAD BOY
ENTERTAINMENT HOLDINGS, INC., BAD
BOY PRODUCTIONS HOLDINGS, INC., BAD
BOY BOOKS HOLDINGS, INC., BAD BOY
RECORDS LLC, BAD BOY ENTERTAINMENT
LLC, BAD BOY PRODUCTIONS LLC,
ORGANIZATIONAL DOES 1-10, INDIVIDUAL
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN
CARTER’S EMERGENCY MOTION FOR AN ORDER TO SHOW CAUSE AND AN
ORDER FOR THE PRESERVATION OF EVIDENCE AND TO STRIKE THE
COMPLAINT AND DISMISS MR. CARTER FROM THIS ACTION PURSUANT TO
FED. R. CIV. P. 12(F)**

I, Alex Spiro, swear under penalty of perjury, pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP, counsel to Defendant Shawn Carter in the above-captioned action. If called as a witness, I could and would testify competently to the information contained herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the complaint in Civil Action No. 2:24-cv-02873 in the United States District Court for the Eastern District of Louisiana.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the complaint in Civil Action No. 2:24-cv-02827 in the United States District Court for the Eastern District of Louisiana.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the summons in the matter of *Jane Doe v. Anthony G. Buzbee* in the Supreme Court of the State of New York, County of New York.

I declare under the penalty of perjury that the foregoing statements are true and correct.
Executed in New York, New York on the 18th day of December 2024.

/s/ Alex Spiro

Alex Spiro